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IN PRO PER
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,

Plaintiff and Counterclaim

Defendant

vs.

ASHLEY RICHARDSON,

Defendant and Counterclaim

Plaintiff

Case No.: 2:23-cv-04669-MEMF-MAR

DECLARATION OF MICHELE
FLEURY IN SUPPORT OF
DEFENDANT/COUNTERCLAIMANT
ASHLEY RICHARDSON'S
OPPOSITION TO PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGEMENT

DECLARATION OF MICHELE FLEURY

I, Michele Fleury, declare as follows:

DECLARATION OF MICHELE FLEURY IN SUPPORT OF DEFENDANT/COUNTERCLAIMANT ASHLEY
RICHARDSON'S OPPOSITION TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGEMENT -

- 1 1. I am over the age of 18 and competent to testify and I have personal
2 knowledge of the facts herein.
- 3 2. I have known Ashley Richardson since 2010. We were in a long-term,
4 committed relationship until the summer of 2024, for approximately
5 fourteen years. During that time, we shared a home, a life, and full
6 transparency about our daily experiences. I have personal knowledge of the
7 matters stated herein, and, if called as a witness, I could and would
8 competently testify to the matters herein.
- 9 3. I met Taylor Thomson through Ashley early in our relationship. Over the
10 years, I observed the dynamic between them closely, as Ashley and I
11 discussed nearly everything happening in our lives. I was also present with
12 Ms. Thomson (with Ashley present and also one-on-one with Taylor) on a
13 number of occasions, as more fully discussed below.
- 14 4. Taylor's involvement in Ashley's life intensified over time, well before any
15 cryptocurrency trading. I personally witnessed Ashley struggling with a deep
16 psychological need to please Taylor that predated all financial dealings.
- 17 5. Taylor was certainly aware of my relationship with Ashley. On more than
18 one occasion, Ashley told me that Taylor had suggested she "shouldn't be
19 with me" and that Ashley's life would be "much better" if she left me.
20 Ashley shared these conversations with me in real time.
- 21 6. In the summer of 2019, during a difficult period in my relationship with
22 Ashley, Taylor's influence and comments were part of the emotional
23 turbulence we were navigating.

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25
26
27 **I. Taylor's Romantic and Boundary-Crossing Behavior Toward Ashley**

28 DECLARATION OF MICHELE FLEURY IN SUPPORT OF DEFENDANT/COUNTERCLAIMANT ASHLEY
RICHARDSON'S OPPOSITION TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGEMENT -

- 1
2 7. Ashley told me, and I fully believed her, that Taylor insisted they share a
3 bed on multiple trips throughout their friendship. I clearly recall discussing
4 these incidents and Ashley expressing how uncomfortable it made her. She
5 mentioned this occurring the following:
 - 6 a. A trip to Italy in 2013 (that involved Taylor as hostess)
 - 7 b. A trip to Jamaica in 2017 (with Taylor, etc.)
 - 8 c. A trip to Victoria, British Columbia in 2019 (with Taylor, etc.)
- 9
10 8. During the Victoria trip, Ashley told me that Taylor said if she left me they
11 could be together and that Ashley's life would improve exponentially as a
12 result. Ashley was extremely upset by this because she was aware that
13 rejecting Taylor's proposition could negatively impact their friendship.
- 14
15 9. I was aware that Taylor had a pattern of romantic fixations on women.
16 Taylor told us about her belief that she was on a "date" with Beau St. Clair
17 when she traveled to Italy to be with her around 2010, only to find out that
18 Beau was married to a man. It became a running joke for years in our close
19 friend group, and Taylor repeatedly openly expressed her romantic attraction
20 to Beau, as well as and she openly romantic interest in other women,
21 including the musician LP and the writer Jessica Bendinger to me directly.
- 22
23 10. Over the years, I personally witnessed Taylor developing intense
24 attachments to people followed by sudden, harsh withdrawals. I experienced
25 this pattern myself when Taylor abruptly stopped speaking to me or inviting
26 me to dinners or events in the spring of 2019.
- 27
28 11. I have a clear memory of Taylor turning on a mutual friend, Rand Rusher,
when she felt taken advantage of when he was raising funds for his
company, Stitch Labs. Rand was always invited to parties and dinners, but,
after Taylor saw that some of the investment would go towards paying
salaries for employees, she stopped inviting him. Taylor spoke poorly about
him to me and to others. I also recall Rand mentioning no longer being
invited and being perplexed and concerned he had done something to upset
Taylor without understanding why.

1 12.I also remember Taylor turning on a very close and occasional romantic
2 partner, Ron Murphy. She became very upset that Ron was not able to pay
3 the extravagant costs for dinners and outings, and she told me and others that
4 he was not very interesting or connected and that if he couldn't pay his own
5 way he should not attend.

6 13.I also remember her speaking poorly of our mutual friend, Catherine
7 Hardwicke, after she approached Taylor to invest in a film, on or about
8 2010-2011. From that point onward, I remember Taylor saying that "Cat"
9 was a "taker."

10 14.In addition to close friends, I distinctly remember Taylor being cold and
11 accusatory to her daughter's boyfriends. I remember her calling Madeliene's
12 boyfriend a "taker" multiple times throughout their relationship, and
13 complaining about having to pay for his travel and his use of their Malibu
14 Beach House. I remember Taylor saying that, if Madeleine married him, she
15 would "cut her out." I also distinctly remember Taylor speaking poorly of
16 Madeleine's boyfriend, Cameron Moulene, saying that he was a "taker,"
17 and, as recently as January 2022 (the last time I saw Taylor in person),
18 saying that she suspected him of doing something untoward with her crypto
19 currency and that she had her friend Shiro Gutzie checking the blockchain to
20 look at his purchases. Taylor also mentioned being very upset that he was
21 claiming to own a number of NFT's that she believed belonged to her.

22 15.In addition to close personal friends that she turned on a number of trusted
23 staff members. I recall Taylor feeling uncomfortable about the closeness
24 between Yasmeen Saleh and her daughter Madeliene, and numerous times
25 expressing concern that Madeleine would retain Yas as her personal
26 assistant after reaching the age of 18. I remember distinctly at a time when
27 her daughter Madeleine had increasing reliance on Yas for emotional and
28 mental health support, Taylor saying she would do anything to make sure
Yas was out of the picture. Shortly after this declaration Yas was fired, and
Taylor began accusing her of grand theft continuously to her close friends
and acquaintances.

1 16.I also remember Taylor accusing staff members who worked as
2 housekeepers including Maria, Dora, and Raquel of theft and of lying to her.

3
4 **II. Taylor's Crypto Demands and Ashley's Relentless Pressure to Comply**

5 17.From August 2021 until late April 2022, I was present for countless
6 conversations where Taylor demanded that Ashley purchase cryptocurrency
7 immediately, often at odd hours, with extreme urgency. Taylor was in the
8 United Kingdom during much of this time and would call Ashley at all hours
9 of the night and talk to Ashley on the phone for hours, making purchase
10 demands that were frequent, emotionally charged, and placed enormous
11 pressure on Ashley.

12 18.I recall a dinner in June 2021 where Ashley introduced Taylor to psychic
13 predictions about cryptocurrency (specifically the predictions of Michelle
14 Whitedove). Taylor had expressed an ongoing interest in Crypto currency
15 and was eager to begin purchasing alt coins. We (Ashley, Taylor, and I)
16 were at Nobu Restaurant in Malibu, and Ashley mentioned the alt coins that
17 Michele Whitedove predicted would be top performers in the coming
18 months. Taylor reacted by immediately telling Ashley she wanted to
19 purchase at least one million dollars (\$1,000,000) of each of the coins that
20 Whitedove predicted would do well. Ashley said that would be too risky.
21 Taylor immediately spoke down to Ashley saying that her hesitation
22 reflected a "poverty mentality" and that is why she would "always be poor."
23 Taylor's above statements were not made in jest. Taylor was deadly
24 serious. I found Taylor's comments belittling and controlling, and in no way
25 indicative that Taylor would ever rely on Ashley for any financial guidance,
26 especially as it related to crypto currency purchases.

27 19.I witnessed Taylor instructing Ashley on what to buy, how much to buy, and
28 when to buy. Ashley frequently told Taylor that the amounts were "too high"
and the risks too great. I specifically remember Taylor demanding an
exceptionally large amount of the coin Persistence, and Ashley repeatedly
telling her she was concerned the amount was too big and begging her to de-
risk and purchase less. In early September of 2021, I remember Taylor
having committed to a purchase of Persistence in the amount of \$40 million,

1 and repeatedly asking Ashley to increase the purchase to \$60 million. I
2 overheard Ashley tell Taylor repeatedly that the amount she was requesting
3 was too high and was too much risk for one project. Ashley was feeling
4 incredible pressure at this time and confided in me that she felt if the project
5 went up substantially in value Taylor would blame her for telling her not to
6 invest more, but she was also concerned that in a market crash Taylor would
7 blame her. I heard Ashley repeatedly tell Taylor that she was not a financial
8 advisor and that what she was learning was based off the Psychic predictions
9 she was reading in Whitedove's newsletters in addition to her limited
10 research. Taylor made it clear, repeatedly, over the phone with Ashley and at
11 dinners we shared at Nobu, that these decisions were her own. She had a
12 compulsive need for more coins as the market began to rise. I remember at
13 one point Taylor demanded she quickly purchase the coin OHM and that
14 Ashley was terrified because while she would make purchases the price of
15 the coin would change due to low liquidity. I would watch Ashley hunched
16 over her laptop, sometimes for twenty hours a day, working on executing
17 these purchases. During this time, Ashley became increasingly fearful of our
18 personal safety. Ashley mentioned that, if anyone found out we had this
19 much crypto in our home, we could be in grave physical danger. Despite the
20 crypto markets continued surge during this time, and Taylor's profits
21 increasing, Ashley became increasingly depressed and withdrawn, which
22 was unlike her. The magnitude of the stress and keeping Taylor happy
23 consumed her life.

24
25 20. Ashley never acted as a financial professional in our relationship. She had no
26 training or professional background in finance. Ashley worked in Business
27 Development and Marketing, and, from 2015-2021, worked full time as a
28 development executive and producer for film and television. Ashley's only
investment up until that time was in our home in Los Angeles California.
Taylor knew this, and she often referred to us as her "poor friends." Despite
that, Taylor continued asking Ashley to execute complex, high-pressure
transactions that consumed Ashley's entire life.

21. I personally saw Ashley turn down paying work—including work with my
own production company—because she was overwhelmed and consumed by
carrying out Taylor's never-ending trading demands. I remember Ashley's
friend, Lina Esco, reaching out during this time about producing a project,

1 and Ashley declining because she had no time. I remember Ashley receiving
2 offers to help with marketing for crypto companies during this time, and
3 Ashley declining because the work she was doing for Taylor was all
4 consuming.

5 22. Ashley's mental state deteriorated dramatically from late 2021 onward. I
6 witnessed panic attacks, insomnia, emotional breakdowns, and intense
7 anxiety directly related to Taylor's demands and the losses that followed.
8 Ashley's personality changed under the strain; she became exhausted,
9 depleted, and increasingly fearful of disappointing Taylor. I would watch
10 Ashley hunched over her laptop, sometimes for twenty (20) hours a day,
11 working on executing these purchases. During this time Ashley became
12 increasingly fearful of our personal safety. She mentioned that if anyone
13 found out we had this much crypto in our home that we could be in grave
14 physical danger. Despite the crypto markets continued surge during this
15 time, and Taylors profits increasing, Ashley became increasingly depressed
16 and withdrawn, which was unlike her. The magnitude of the stress and
17 keeping Taylor happy consumed her life. When we received invitations to
18 spend time with family and friends, Ashley would refuse, too fearful to leave
19 our home and the crypto behind. I remember clearly that in November of
20 2021 Ashley was exhausted, overwhelmed, and as a result did not attend
21 Thanksgiving with my family because she did not want to take the risk of
22 Taylor's crypto being unattended. I remember being concerned for her
23 mental and physical health, which both seemed to be in rapid decline.

24 **III. Taylor's Role in the Collapse of Ashley's Social, Personal, and**
25 **Professional Life**

26 23. I watched Ashley's social circle evaporate after Taylor began speaking
27 negatively about her. Friendships Ashley had maintained for years suddenly
28 ended and people distanced themselves from Ashley without explanation.
Ashley was incredibly close to Taylor's daughter, Madeliene; they spoke all
the time. In addition, Ron Murphy was a close mutual friend of ours. Both
Madeliene and Ron cut Ashley completely out of their lives after the market
crashed, and Taylor began publicly accusing Ashley of fraud and theft. In
addition, our good friend Catherine Hardwicke stopped reaching out and
responding to Ashley, as did other mutual friends, including Kevin

1 Fitzgerald. During the pandemic this was our small limited social circle, and,
2 once Taylor turned on Ashley, all her closest friends followed suit. Based on
3 everything I know about Taylor, her history of turning on people, and what
4 she has said about Ashley, there is no doubt in my mind that these
5 friendships ended because of the falsehoods Taylor spread about Ashley. I
6 personally witnessed how this severance of support crushed Ashley and had
7 a profoundly damaging impact on her mental and physical health.

8 24. Based on Ashley's direct conversations with Catherine Hardwicke,
9 Madeliene Thomson, in addition to direct observations of how our mutual
10 friends shunned Ashley simultaneously, I believe this was due to Taylor's
11 defamatory statements about Ashley within their mutual social circles. The
12 shift was abrupt and unmistakable.

13 25. The pressure and emotional toll of Taylor's conduct caused devastating
14 consequences: Taylor specifically told mutual friends and colleagues,
15 including but not limited to: Catherine Hardwicke, Shiro Gutzie, and Ron
16 Murphy that Ashley had taken a secret kickback, and had stolen from her.
17 These allegations were incredibly harmful and as a result she lost work
18 opportunities, her professional reputation suffered, and her long-term
19 stability was destroyed.

20 26. Since I met Ashley, she always made herself available to Taylor at all hours
21 in all ways asked of her. There was an unmistakable power imbalance in this
22 friendship. Taylor Thomson is one of the wealthiest women in the world
23 with immense power and the ability to influence those around her. Ashley
24 felt deeply loyal to her and would do anything. I watched over the years as
25 Ashley dropped opportunities for meetings, or dinners with my own family,
26 to be there for Taylor. I remember that Ashley had a huge project she was
27 working on in the spring of 2016. Ashley told me she did not have time or
28 desire to go to Coachella, but felt, if she didn't, she would be letting Taylor
down. Ashley arranged passes for Taylor, got them entry into the most
exclusive events, and drove them to and from the venue. Over the years, I
watched Taylor invite Ashley to her trips and outings, but Ashley also
functioned as someone who would function as an assistant at any time
anything was needed. Ashley would stay back and take care of Taylor when

1 she would consume too much alcohol, she would help Taylor's daughter
2 manage anxiety, she would interface with Taylor's staff or yacht crew to
3 problem solve. Ashley even re-homed Taylor's chickens at Taylor's
4 request. I fully believe Taylor took advantage of Ashley's loyalty,
5 psychological vulnerability, and desire for approval. This dynamic, and the
6 emotional harm it caused, existed long before the cryptocurrency collapse or
7 the lawsuit.

8 **IV. Taylor's False Allegations and the Catastrophic Impact on Ashley**

9 27.Beginning in 2021, I saw firsthand the profound effect the lawsuit filed by
10 Taylor had on Ashley. Taylor's accusations, including claims of fraud and
11 theft, were deeply distressing to Ashley and inconsistent with the person I
12 know.

13 28.I witnessed Ashley go from a vibrant, engaged, successful person to
14 someone emotionally devastated, overwhelmed, and financially ruined over
15 the course of several years, and I saw this change unfold in direct connection
16 with Taylor Thomson's escalating demands, the collapse of the
17 cryptocurrency market in late 2021 and 2022, and Taylor's later accusations
18 against her. When Ashley and I first met and for many years of our
19 relationship, she was confident, creative, and professionally active—she ran
20 large digital projects, had a strong reputation in her industry, and was
21 consistently generating new opportunities and ideas. She was socially
22 connected, energetic, and highly functional in every area of life. That began
23 to change noticeably after Taylor's involvement in cryptocurrency
24 intensified. I watched Ashley become increasingly consumed by Taylor's
25 constant requests, late-night messages, and urgent demands to execute trades
26 or monitor positions. Ashley would be woken up at all hours, glued to her
27 phone or computer, and visibly panicked about "getting it right" for Taylor.
28 She told me repeatedly that she felt she could not say "no" to Taylor or slow
things down because of the imbalance in their financial power and because
she believed, if Taylor turned on her like she had with so many others, it
would destroy her.

After the crypto market crash in 2021–2022, Ashley's emotional and
financial condition deteriorated dramatically. I saw her go from someone

1 who had savings, a career, and a clear sense of direction to someone who
2 was afraid to open her bank accounts and physically shaken by the thought
3 of Taylor's reaction to the losses. She stopped pursuing her own projects and
4 income because she was overwhelmed and ashamed. She had trouble
5 sleeping, experienced frequent panic attacks, and would often break down
6 crying after interactions related to Taylor's portfolio or the fallout from it.
7 When Taylor later began accusing her of fraud and theft, and then filed this
8 lawsuit, I witnessed an even sharper decline. Ashley would say things like
9 "my life is over" and "no one will ever trust me again," and she spent
10 countless hours trying to respond to legal filings she could not afford a
11 lawyer to handle. Her stress was extreme and constant. She became suicidal,
12 lost all confidence and ability to interact with her friends and family, and she
13 became increasingly withdrawn. She would wake up with constant panic
14 attacks, and the insomnia took a huge toll on her physical and mental health.
15 By this point, she was no longer the confident, successful person I had
16 known for most of our relationship, but someone who was emotionally
17 devastated, chronically overwhelmed, and financially ruined in ways that
18 were clearly tied to Taylor's ongoing demands, the market collapse, and
19 Taylor's refusal to take responsibility for her own investment decisions
20 while publicly blaming Ashley instead.

21 29. Ashley had been sober for two years. When she relapsed on October 12,
22 2024, it was due to the unbearable emotional pressure of our recent breakup,
23 her financial collapse, and the escalating legal attacks by Taylor. That
24 evening, Ashley also sent me a series of text messages that were out of
25 character and were not directed toward violence; it reflected a culmination of
26 extreme and life-ruining damage caused by Taylor Thomson that led to
27 profound emotional despair, not malice.

28 30. The lawsuit consumed Ashley's life because she could not afford legal
29 counsel. She was forced to defend herself pro se against a multi-billionaire
30 with unlimited legal resources. I witnessed this imbalance destroy Ashley
31 emotionally, financially, and psychologically.

32 31. In the years leading up to the lawsuit filed in 2023, I personally observed
33 Taylor engage in a pattern of conduct that had increasingly damaging effects
34 on Ashley's emotional and psychological wellbeing. Before any legal action

1 existed, Taylor had already begun making negative statements about Ashley
2 to members of our social and professional circles. Several friends and
3 colleagues, including Ron Murphy and Catherine Hardwicke, stopped
4 interacting with Ashley abruptly, and, when we later spoke with some of
5 them, it became clear that Taylor had portrayed Ashley as untrustworthy or
6 financially irresponsible in ways that did not reflect reality. During this same
7 period, Taylor's behaviour toward Ashley around cryptocurrency became
8 increasingly controlling. She demanded immediate execution of trades at all
9 hours, pressured Ashley to take risks Ashley expressed discomfort with, and
10 dismissed Ashley's attempts to slow things down or express concern. Ashley
11 often confided in me that she felt intimidated, ashamed, and unable to set
12 boundaries because Taylor's financial power and influence were so
13 overwhelming. By the time Taylor filed her lawsuit—and in my view
14 attempted to shift blame onto Ashley for losses Taylor herself directed—
Ashley's mental health, physical health, stability, and relationships had
already been profoundly weakened. Taylor's escalating accusations, blame-
shifting, and negative statements to others amplified that decline,
contributing directly to the collapse of Ashley's career, confidence, and
support system.

15 **V. Ashley Was Not a Fiduciary or a Financial Professional**

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17 32. At no point during Ashley's relationship with Taylor did I ever see or hear
18 Ashley hold herself out as a fiduciary or assume the type of professional
19 control or discretion over Taylor's finances that a fiduciary relationship
20 requires. To the contrary, every discussion about cryptocurrency or
21 investments that I witnessed between them showed Ashley responding to
22 Taylor's instructions, not directing or managing Taylor's finances
23 independently. Taylor was the one making the decisions, setting the
24 amounts, and insisting on the timing of trades. Ashley repeatedly told Taylor
25 she felt uncomfortable with the risks or uncertainties involved, which is
26 wholly inconsistent with a fiduciary role. My understanding of their dynamic
27 comes from years of observing their conversations in our home, at dinners,
28 and on trips, and from the countless times Ashley came to me stressed
because Taylor was pushing her to execute transactions immediately.
Nothing in Ashley's behaviour suggested she ever acted with the authority,
independence, or duty of care that defines a fiduciary.

1 33. Ashley never held herself out as a financial advisor or professional, and
2 Taylor was fully aware of this. I know from direct, repeated conversations
3 involving all three of us that Ashley never represented herself as a financial
4 expert, advisor, or professional, and that Taylor was fully aware of Ashley's
5 lack of formal financial training. Taylor often made comments
6 acknowledging that Ashley came from a creative background, not a financial
7 one. We all joked many times—including in Taylor's presence—about
8 Ashley's learning curve with cryptocurrency and blockchain terminology.
9 Taylor herself explained complex financial concepts to Ashley, and I saw
10 her send Ashley articles, videos, and newsletters she received from outside
11 sources because she understood Ashley was still trying to understand the
12 space. On multiple occasions, Taylor made statements along the lines of "I
13 know this isn't your field" or "I'm the one who's done this for years."
14 Taylor's awareness was unmistakable: Taylor never relied on Ashley for
15 financial strategy or professional advice, but instead used her as someone to
16 execute decisions Taylor had already made. I personally witnessed this
dynamic in the summer of 2021 when Taylor mentioned a desire to purchase
a number of "alt coins" including Persistence, Theta, and OHM. During
these conversations, Taylor would direct what to buy and when to buy it
while I remember Ashley repeatedly expressing hesitation at the amounts
being spent or confusion as to how to best purchase what was being
requested.

17 34. Taylor herself is a sophisticated, seasoned investor with considerable
18 resources and financial advisors. I know that Taylor is a sophisticated
19 investor because, throughout the fourteen years I knew her, she frequently
20 discussed her investment activities, her long-standing interests in venture
21 opportunities, art purchases, real estate purchases, investments in businesses
22 including a drug to stop strokes, and her extensive financial resources. On
23 several occasions, Taylor referenced her involvement in significant financial
24 transactions, including private investment deals, real estate acquisitions, and
25 high-value asset management. She talked openly about her financial advisors
26 and attorneys, often mentioning that she needed to "run something by" her
27 advisor or that her team had prepared documents for her. She was often
frustrated that her family office made her run investments by advisors, and
made it clear she preferred risky investments and would like to do things
without oversight of her family office. During international trips, especially
in 2017 and 2020, I saw her taking calls with financial professionals and

1 reviewing documents that Ashley was not involved in. I also personally
2 observed Taylor managing her finances through structured systems,
3 including frequent communication with wealth managers, accountants, and
4 legal advisors. Taylor carried herself with the confidence and familiarity of
5 someone deeply experienced with investing and who was accustomed to
6 delegating tasks to professionals. By contrast, Ashley had no comparable
7 experience or support system.

8 35. In the years I observed them interact, Taylor frequently used the enormous
9 financial and social power she held over Ashley to push her into roles she
10 was not trained for, including pressuring her into managing increasingly
11 complicated and high-risk cryptocurrency transactions. Ashley often
12 expressed fear of disappointing Taylor because Taylor controlled not only
13 the finances involved but also the emotional temperature of their friendship.
14 Taylor's reactions to hesitation—belittling Ashley's concerns, framing
15 Ashley as "scarcity minded," or suggesting that Ashley was incapable—
16 created a dynamic where Ashley felt obligated to comply, even when she
17 was overwhelmed or confused. I watched Ashley collapse under the weight
18 of the expectation that she manage massive financial transactions without
19 training, without guidance, and without the freedom to say no. Taylor's
20 influence was not just financial; it was emotional. Ashley revered Taylor as
21 a friend and feared losing that friendship. Taylor's ability to combine
22 affection, intimidation, urgency, and withdrawal made Ashley extremely
23 vulnerable to manipulation. As Ashley's partner for fourteen years, I
24 observed the toll of this dynamic daily—panic, shame, exhaustion, physical
25 deterioration, and a complete erosion of confidence. In my view, Taylor
26 used her power and influence in ways that exploited Ashley's loyalty and
27 pushed her far beyond her emotional and professional capacity.

28 **VI. Concluding Statement**

36. Everything I have stated here is true to the best of my knowledge.

37. I witnessed Ashley's suffering, decline, and devastation directly. The
emotional, financial, and psychological harm she experienced was
catastrophic and unquestionably tied to Taylor Thomson's conduct.

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7 I declare under penalty of perjury that the foregoing is true and correct.
8 Executed December 10, 2025, in Palm Desert California.
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10 Respectfully submitted,
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12 Michele Fleury
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14 Dated December 10, 2025.
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17 _____
Michele Fleury
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28 DECLARATION OF MICHELE FLEURY IN SUPPORT OF DEFENDANT/COUNTERCLAIMANT ASHLEY
RICHARDSON'S OPPOSITION TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGEMENT -